Alford, Patrick

| From: | Barry Nerhus [bnerhus@gmail.com] | |
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| Sent: | Monday, November 07, 2011 11:28 AM | |
| To: | Alford, Patrick | |
| | 5:1 : 15 | |

Subject: Biological Resource comments for dEIR

Hello,

I reviewed the Biological Resources section of the dEIR and found a few items in question:

- 1. Southwestern Pond Turtle I have data that shows southwestern pond turtles do not need permanent water nor high quality freshwater marsh to survive. Additionally from personal observation, southwestern pond turtles can utilize tidal marshes, estuaries, and salt marshes for foraging. So my question is what was the methodology for survey for southwestern pond turtles? Visual surveys are inadequate for surveying for this species.
- 2. Light-footed Clapper Rail Since the freshwater marsh habitat was described to have cattails and rushes, there is a potential to have nesting Clapper Rails. It was stated that a fence was dividing the cordgrass habitat that is known to have at least one nesting pair. Well this bird has wings and can easily fly over a fence. Additionally, I located and documented a clapper rail nest in freshwater marsh this past year with 9 eggs. They hatched and were observed foraging throughout the freshwater marsh. Light-footed clapper rails are known to nest in freshwater marshes.
- 3. Since there are alkali grasslands, there is potential for the rare Wandering Skipper. I may have missed this in the dEIR. You may want to pose this question or research this small butterfly that is endemic to coastal salt marshes in Southern California and northern baja, which therefore should be a sensitive species. Although I am qualified to give an expert opinion on the southwestern pond turtle and the light-footed clapper rail, I cannot give an expert opinion on the wandering skipper.

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